The Honorable Stephen Taylor Commissioner Department of Insurance, Securities, and Banking 810 First Street, N.E., Suite 710 Washington, DC 20002

Dear Commissioner Taylor:

I am concerned with the recent Decision and Order you issued related to Group Hospitalization and Medical Services, Inc. Plan, otherwise known as CareFirst BlueCross BlueShield ("CareFirst"), which could divert funds from the CareFirst reserves to pay for other health priorities in the District. I am the owner of Goodwin & Company, a boutique executive search and management consulting firm. I am not a CareFirst subscribe, but am concerned with a plan to divert "excess reserves" to other uses. The reserves that CareFirst holds is an essential safety net that provides peace of mind and a safe guard in case the unthinkable occurs, and its subscribers are faced with expensive medical costs for lifesaving care.

If you believe that CareFirst has excess reserves, it would only be appropriate to either return these dollars to the subscribers in the form of a rebate or a reprieve on future premium payments. I do not believe that this money is an unchecked fund to be used for other medical priorities in the District—regardless of how necessary and important these may be. Public health in the District should be a top priority, but levying a special tax on CareFirst subscribers is not the solution to paying for these programs. I would not want my own provider to be forced to use their funds for other purposes. Every citizen in the District should be responsible for paying for public health programs to help ensure that the most vulnerable in the District are provided adequate medical care.

Sincerely,

Tom Goodwin

Goodwin & Company